

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re: Target Corporation Customer Data
Security Breach Litigation

MDL No. 14-2522 (PAM/JJK)

This Document Relates to:

All Consumer Cases

**DECLARATION OF CONSUMER PLAINTIFFS'
LEAD COUNSEL VINCENT J. ESADES**

I, Vincent J. Esades, declare:

1. I am an attorney licensed to practice before the courts of Minnesota and North Dakota. I serve as the Court-appointed Lead Counsel on behalf of Plaintiffs in the Consumer Cases in this litigation. I am a partner in the firm Heins Mills & Olson, P.L.C. I submit this Declaration in response to the Court's order issued November 10, 2015 (ECF No. 642) ordering the filing under seal of the objections to the settlement in the Consumer Cases that have not been previously filed on the court docket.

2. Attached are the following documents, all filed under seal:

Exhibit A: Objection of John Finn

Exhibit B: Objection of Lindsay Gibson

Exhibit C: Objection of Sam A. Miorelli

Exhibit D: Objection of Robert Mosebar

Exhibit E: Objection of Keith Reiter

Exhibit F: Objection of Arlene Stein

Exhibit G: Objection of Daron Stein

Exhibit H: Objection of Tracey B. Thompson

Exhibit I: Objection of Chanrondra T. Virgin

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10th day of November, 2015, in Minneapolis, Minnesota

s/ *Vincent J. Esades*
Vincent J. Esades